

July 30, 2025

BY CM/ECF

The Honorable Andrew L. Carter
United States District Court for the Southern District of New York
40 Foley Square, Room 444
New York, New York 10007

Re: NJCA et al v. DOL et al., No. 25 Civ. 04641 (ALC)

Dear Judge Carter:

We write on behalf of the parties pursuant to the Court's direction at the July 23, 2025, hearing to provide a joint status report concerning settlement. The parties have met and conferred a few times since July 23, and have had preliminary discussions about the scope of settlement (Defendants have proposed that, to be effective, a settlement would have to go beyond the named plaintiffs in this case) and the format of further discussions (e.g. whether referral to a mediator may be appropriate). The parties respectfully request that the Court direct them to file a further joint status update by August 13, 2025.

We thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Maximilian L. Feldman

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